

## Morgan Rose

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**From:** Sarah A. Zylstra  
**Sent:** Friday, July 15, 2022 12:06 PM  
**To:** Ingrisano, Jonathan  
**Cc:** Tanner G. Jean-Louis; Noel Sterett  
**Subject:** RE: Call Follow-Up [GK-Active.FID3018047]

Jonathon,

Thank you for the call. The below is fine with just a few additional/clarifying points. Tanner has a conflict on August 17 so I proposed in an email (our emails crossed) that instead of the 17, we use August 22 or 23. Do either of those dates work for you? Also, I believe you mentioned that you were going to check with Sister Phelan on whether you could accept service of the subpoena on her behalf. If you are not able to do that, I would appreciate you providing her address for service. I will plan on serving subpoenas for Ms. VanderSanden and Ms. Balistreri-Clarke.

One item that we did not discuss. Is it possible for you to accept service of the subpoena for Wood Communications? They spoke to the process server and apparently are rarely working from the office and instead are at their home in LaValle. I can send someone to LaValle but thought I would check with you first.



**SARAH A. ZYLSTRA** (SHE/HER)  
ATTORNEY

DIRECT +1 608-283-1741  
PHONE 608-257-9521  
FAX 608-283-1709  
[SZYLSTRA@BOARDMANCLARK.COM](mailto:SZYLSTRA@BOARDMANCLARK.COM)  
[BOARDMANCLARK.COM](http://BOARDMANCLARK.COM)

BOARDMAN & CLARK LLP  
1 SOUTH PINCKNEY ST STE 410  
PO BOX 927  
MADISON, WI 53701-0927

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**From:** Ingrisano, Jonathan <jingrisa@gklaw.com>  
**Sent:** Friday, July 15, 2022 11:47 AM  
**To:** Sarah A. Zylstra <szylstra@boardmanclark.com>  
**Cc:** Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Noel Sterett <nsterett@daltontomich.com>  
**Subject:** Call Follow-Up [GK-Active.FID3018047]

Sarah:

Thank you for the call today.

The Defendants have identified Ms. VanderSanden, Sr. Phelan, and Ms. Balisteri-Clarke as intended deponents. The Plaintiffs intend to depose the UW and Tim Parks. We have tentatively blocked off August 10, 11, 16, 17, and 18 for these depositions. I will be confirm Sr. Phelan's availability while you confirm Mr. Parks'. We can talk further when you return from vacation after next week.

I raised the issue of potential privileged documents in the anticipated third party productions by Vandewalle and Wood. My intention is to work with these subpoenaed parties to pre-screen their production for privilege. Please confirm that you have no objection to this process, which will not be taken as a waiver of any objection by the Defendants to an assertion of privilege.

Lastly, I raised the issue of John Strange's communications in 2019. I don't believe that many communications to or from Mr. Strange have been produced. We are asking the City to revisit that issue, particularly for communications from the January through March 2019 and July through August 2019 timeframes. You were going to look into this request and we can discuss further upon your return.

Jonathan

**Jonathan Ingrisano** | Attorney

414.287.9611 direct

[jingrisa@gklaw.com](mailto:jingrisa@gklaw.com)

**GODFREY & KAHN<sup>SC</sup>**

833 E. Michigan Street, Suite 1800 | Milwaukee, Wisconsin 53202-5615



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